

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RICH HALLMAN, an individual, on behalf of
himself and all others similarly situated,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.; and DOES 1
through 10, inclusive

Defendant.

NO. 2:18-cv-01190 JLR

STIPULATION AND ~~PROPOSED~~
ORDER TO MODIFY RULE 16(B) AND
RULE 23(D)(2) SCHEDULING ORDER
REGARDING CLASS CERTIFICATION
MOTION

NOTING DATE:
DECEMBER 14, 2019

STIPULATION

The undersigned parties hereby stipulate to extend the deadlines for discovery and briefing related to class certification according to the schedule set forth below. In support thereof, the parties jointly state the following:

1. The Court entered its Rule 16(B) And Rule 23(D)(2) Scheduling Order Regarding Class Certification Motion on October 4, 2018 (Doc. 16). That schedule set January 9, 2019, as the date for completion of discovery on class certification issues.
2. Since that time, the parties have been working diligently and expeditiously to complete discovery according to the original schedule issued by the Court. However, in light of the issues presented by this case, as well as holiday schedules for witnesses and potential

STIP AND PROPOSED ORDER TO MODIFY SCHEDULING
ORDER RE CLASS CERTIFICATION (18-1190) - Page 1

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1 class members in this action, the parties need additional time to complete necessary discovery
2 related to class certification.

3 3. The parties also believe that it is appropriate to amend the default briefing schedule set
4 by the local rules in order to provide both parties sufficient opportunity to address the
5 complex legal and factual issues presented by this case.

6 4. Good cause exists because extending these deadlines will permit the parties to develop
7 a full and complete record that will assist the “district court [to] undertake[] a ‘rigorous
8 analysis’ of the prerequisites for certification,” in line with the requirements of Federal Rule
9 23. *ABS Entm’t, Inc. v. CBS Corp.*, 908 F.3d 405, 427 (9th Cir. 2018).

10 5. Below, the parties have set forth an alternate discovery and briefing schedule, which
11 they respectfully request that the Court enter:

Event	Current Schedule	Proposed Schedule
Deadline to complete discovery on class certification	1/9/19	4/9/19
Deadline for Plaintiffs to file motion for class certification	2/8/19	5/10/19
Opposition to Class Certification	3/4/19 (per LCR 7(d)(3))	7/9/19
Reply Brief	3/8/19 (per LCR 7(d)(3))	8/8/19

17
18 Dated: December 1, 2018

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~~PROPOSED~~ ORDER

Based on the foregoing Stipulation, it is hereby ORDERED as follows:

1. The deadline to complete pre-certification discovery is hereby extended to April 9, 2019.
2. The Plaintiffs' motion for class certification must be filed on or before May 10, 2019.
3. The Defendant's opposition to class certification must be filed on or before July 9, 2019.
4. The Plaintiffs' reply brief in support of class certification, if any, must be filed on or before August 8, 2019.

Entered this 17th day of December, 2018.



THE HONORABLE JAMES L. ROBERT

CERTIFICATE OF SERVICE

I hereby certify that on the date below written, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and caused to be served a true and correct copy of same by the method indicated below and addressed as follows:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 14, 2018, in accordance with 28 USC 1746.



Jazmine Matautia